

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11 (Subchapter V)
FREE SPEECH SYSTEMS LLC,	§	
	§	Case No. 22-60043
	§	
Debtor.	§	

**NOTICE OF DISTRIBUTION OF RETAINER UNDER LOCAL  
BANKRUPTCY RULE 2016-1(C) FOR SERVICES PROVIDED AND FEES INCURRED  
FOR THE PERIOD OF MARCH 1, 2024 TO MARCH 31, 2024**

**IF YOU WANT A HEARING, YOU MUST REQUEST ONE IN WRITING, AND YOU MUST RESPOND SPECIFICALLY TO EACH PARAGRAPH OF THIS PLEADING. YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY-ONE (21) DAYS FROM THE DATE YOU WERE SERVED AND GIVE A COPY TO THE PERSON WHO SENT YOU THE NOTICE. IF NO OBJECTION IS TIMELY FILED DISBURSEMENTS WILL BE MADE FROM RETAINER IN ACCORDANCE WITH LBR 2016-1(c). NOTWITHSTANDING ANY SUCH DISBURSEMENTS, A FINAL FEE APPLICATION SHALL BE FILED AT THE CONCLUSION OF THIS CASE IN ACCORDANCE WITH FED. R. BANKR. P. 2016.**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

O'ConnorWechsler PLLC ("OWPLLC") attorneys for Free Speech Systems, LLC ("Debtor"), debtor and debtor in possession file this notice in compliance with Local Bankruptcy Rule 2016-1(c) for authority to distribute \$75,000 from the retainer of the bankruptcy estate of the Debtor for professional services rendered and expenses incurred during the period running from March 1, 2024, through March 31, 2024 ("Notice"). In support of this Notice, OWPLLC respectfully represents as follows:

1. The above captioned chapter 11 bankruptcy case was filed on July 29, 2022 under Title 11 of the Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.*
2. On March 13, 2024, this Court entered an order approving the withdrawal of prior counsel for Debtor, and substituting in OWPLLC as counsel for Debtor.

**FEES AND EXPENSES**

3. OWPLLC holds \$75,000 in a retainer account (“**Retainer**”) and intends to draw on such funds for payment against professional fees and expenses accrued in this case. Absent objection to this Notice (within 21 days after service on you), OWPLLC will be allowed to withdraw and apply from the Retainer paid by the Debtor as a partial and interim allowance to OWPLLC for services performed and expenses incurred on behalf of the Debtor. OWPLLC has avoided unnecessary duplication of work and OWPLLC believes that no significant or unnecessary duplication has occurred.

4. During the time period running from March 1, 2024 through March 31, 2024, OWPLLC earned fees in the total amount of \$88,675. In addition, OWPLLC incurred reimbursable expenses associated with this case in the amount of \$18.92. Attached as **Exhibit 1** are OWPLLC’s invoices totaling \$88,694, and describing in detail the services rendered, time spent, hourly rates charged, and the name of the professional or para-professional performing the work.

5. OWPLLC submits that the foregoing services rendered warrant the allowance of the fees and expenses incurred by OWPLLC under the factors identified by the Fifth Circuit in *Johnson v Georgia Highway Express, Inc.*, 488 F.2d. 714 (5th Cir. 1974), *Barron & Newburger, P.C. v. Tex. Skyline, Ltd. (In re Woerner)*, 783 F.3d 266 (5th Cir. 2015) and Local Bankruptcy Rule 2016(b).

DATED: April 24, 2024.

O’CONNORWECHSLER PLLC

By: /s/ Annie Catmull

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ATTORNEYS FOR DEBTOR

**CERTIFICATE OF SERVICE**

I certify that on April 24, 2024 a true and correct copy of the foregoing *Notice of Distribution of Retainer* was served on the parties identified below through the Court's ECF system.

/s/ Annie Catmull  
Annie Catmull